

HOLLAND & KNIGHT LLP

2099 Pennsylvania Avenue, N.W.
Suite 100
Washington, D.C. 20006-6801

202-955-3000
FAX 202-955-5564
www.hklaw.com

Annapolis
Atlanta
Bethesda
Boston
Bradenton
Chicago
Ft. Lauderdale
Jacksonville
Lakeland
Los Angeles
Melbourne
Miami
International Offices:
Caracas*
Helsinki
Mexico City
Rio de Janeiro

New York
Northern Virginia
Orlando
Portland
Providence
St. Petersburg
San Antonio
San Francisco
Seattle
Tallahassee
Tampa
West Palm Beach
Sao Paulo
Tel Aviv*
Tokyo

* Representative Office

ORIGINAL

June 20, 2002

PETER CONNOLLY
202-862-5989
pconnoll@hklaw.com

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RECEIVED**JUN 20 2002**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Docket 94-102

Dear Ms. Dortch:

Herewith transmitted, on behalf of the United States Cellular Corporation are an original and four copies of its "Petition For Temporary Waiver and Extension of time" in the above-referenced docket.

In the event there are questions, please contact the undersigned.

Very truly yours.


Peter M. Connolly

No. of Copies rec'd _____
List AEODE _____

et 4

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

RECEIVED

JUN 20 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Revision of the Commission's Rules) CC Docket No. 94-102
To Ensure Compatibility With)
Enhanced 911 Emergency Calling)
Systems)

To: Wireless Communications Bureau

PETITION FOR TEMPORARY WAIVER AND EXTENSION OF TIME

United States Cellular Corporation ("USCC"), pursuant to Section 1.3 of the FCC's Rules, requests a temporary and limited rule waiver of Section 20.18(c) of the FCC's Rules and extension of time until September 30, 2002 to meet the June 30, 2002 deadline for digital wireless systems to be capable of transmitting calls from text telephone ("TTY") devices.¹

USCC provides service to approximately 3.5 million customers in 142 majority-owned cellular markets and operates 50 cellular "switches." It will be compliant by June 30, 2002 with the "digital TTY" requirement at 44 of its 50

¹ Section 20.18(c) of the FCC's Rules provides as follows:

"TTY Access to 911 Services. Licensees...must be capable of transmitting 911 calls from individuals with speech or hearing disabilities through means other than mobile radio handsets, e.g. through the use of Text Telephone Devices (TTY)"

switches and thus will be compliant with the rule on all of its systems served by those switches. However, in five of its switches, USCC will require additional time.² It should be able to install the necessary hardware and software for TTY compliance by July 31, 2002 at four of the switches and by September 30, 2002 at the last switch.

As will be shown below, USCC has sought diligently to comply with the relevant rule and should be granted the waiver/extension of time which it seeks for the last five of its switches.

I. USCC Has Acted Conscientiously To Comply With Section 20.18(c)

As noted in USCC's prior quarterly reports filed in this docket on January 17, 2002 and April 15, 2002, USCC employs both Code Division Multiple Access ("CDMA") and Time Division Multiple Access ("TDMA") technology in its systems. All of USCC's TDMA switches use a Nortel platform. Most of USCC's CDMA switches also employ a Nortel platform, though Lucent technology is used at four switches.

The Nortel "MTX10" software load supports digital TTY capability. With respect to USCC's Lucent switches, Lucent's Software Release 16.1 supports this capability.

A note to this section states that operators of digital wireless systems must comply with this requirement on or before June 30, 2002.

² As will be discussed below, one of USCC's switches is "analog" in nature and thus requires no TTY upgrade

Those software releases become available to USCC in December, 2002. After the required software became available to USCC, it commenced an intensive installation campaign at all of its switches.

Rollout of a new software "load" is a lengthy process. Since new software releases often change billing codes, USCC had to request sample billing data from Nortel and Lucent to make sure its bills would remain accurate even after the software load had been installed. Only after verifying that USCC's billing would remain accurate could USCC actually begin installing the switch software upgrades.

USCC has the internal capacity to upgrade two of its switches a week. This is in part because hardware upgrades are usually required with each software upgrade.

Also, Nortel requires a 28 day "soak" period from the time of any hardware installation before the software upgrade can be "run."

Moreover, the upgrading of CDMA systems for digital TTY purposes requires software and hardware upgrades for two network elements, the Mobile Switching Center and the Base Station Controller.

Despite these logistical problems, USCC will have completed the necessary switch hardware and software upgrades to permit it to offer digital TTY service at 88% of its switches by June 30 and promises to finish all the necessary remaining switch upgrades by September 30, 2002.

As is shown in the attached chart (Attachment A), which provides switch by switch data as to when the necessary upgrades have been and will be completed,

USCC will have completed the necessary upgrades at 44 of its 49 switches offering digital service by June 30, and has already completed the vast majority of those upgrades. However, as is shown in the attached chart, USCC, after June 30, will still have to install the necessary upgrades at its Twin Falls, ID, Tallahassee, FL, Asheville, NC, Fort Pierce, FL, and Madison, WI switches.³ USCC expects to complete those hardware and software installations by July 2 (Twin Falls), July 9 (Tallahassee), July 16 (Asheville), July 23 (Fort Pierce), and September 10 (Madison) respectively.

Having to complete the Madison upgrade in September is necessitated by especially difficult switch hardware upgrades at that switch. The Madison switch upgrade will require a different "processor"(a Nortel XA Core processor) than did the other switches (Nortel BRISC 70EM processors) and will require more extensive switch modifications.

Given that the necessary software loads only became available last December, USCC believes that it has done the best it can to comply with the rule and accordingly requests the necessary waiver and extension to complete the job without suffering any penalty.

Conclusion

For the foregoing reasons, USCC requests a temporary waiver of Section 20.18(c) of the Rules and an extension of time until September 30, 2002 to complete its installation of the necessary hardware and software at all its switches to comply with that rule section.

³ The Logansport, IN switch serves an analog system and hence does not require a TTY upgrade.

Respectfully submitted,

UNITED STATES CELLULAR
CORPORATION

By:


/s/ Peter M. Connolly

Peter M. Connolly

Holland & Knight LLP

2099 Pennsylvania Avenue, N.W. #100

Washington, DC 20006-6801

(202) 862-5989

June 20, 2002

Its Attorneys

Switch Name	CDMA OR TDMA	Address:	Processor Upgrade Required	NTN80 Upgrade Schedule DATE
APPLETON (Menasha)	TDMA	2595 Kisser Court, Appleton, WI 54915	yes	03/07/02
TULSA	TDMA	1210 S. Detroit Ave, Tulsa, OK 74120	no	03/12/02
MILWAUKEE (NEW BERLIN)	TDMA	2885 South 166th Street, New Berlin, WI 53151	no	03/13/02
DAVENPORT (BETTENDORF)	TDMA	5230 Devils Glen Rd, Bettendorf, IA 52722	yes	03/14/02
CEDAR RAPIDS	TDMA	1131 26th Ave SW, Cedar Rapids, IA 52404	no	03/19/02
DES MOINES (MARKET)	TDMA	232 SW 11th, Des Moines, IA 50309	no	03/26/02
BROOKFIELD	TDMA	3545 N. 124th Street, Brookfield, WI 53005	no	03/27/02
OWASSO	TDMA	3131 N. Garnett, Tulsa, OK 74116	yes	03/28/02
AUGUSTA	TDMA	50 Tower Road, Manchester, ME 04351	yes	04/02/02
LONGVIEW	CDMA	1318 Washington Way, Longview, WA 98362	yes	04/03/02
CHILHOWEE	CDMA	707 Concord Road, Knoxville, TN 37922	yes	04/04/02
MANCHESTER	TDMA	Wharehouse: Northeast Logistics, US Cellular, Attn: Steve Beauregard, Route 3 & 28, Allentown, NH 03275	yes	04/09/02
KNOXVILLE	CDMA	707 Concord Road, Knoxville, TN 37922	yes	04/10/02
LACROSSE	TDMA	224 Crossroads Center, 9348 US Hwy 16, Onalaska, WI 54650	yes	04/10/02
HENRYETTA	TDMA	1210 S. Detroit Ave, Tulsa, OK 74120	yes	04/11/02
PIKETON (Jackson)	TDMA	Attn: Scott Maxfield, 4010F Rhodes Ave, New Boston, OH 45662	yes	04/16/02
MEDFORD	CDMA	515 Parsons Drive, Medford, OR 97501	yes	04/17/02
SMITHFIELD	CDMA	2432 Packing Plant Rd, Smithfield, NC 27577	yes	04/18/02
EUREKA	TDMA	1020 W Del Norte St, Eureka, CA 95501	yes	04/25/02
MIXMASTER	TDMA	2066 NE 54th Avenue, Des Moines, IA 50313	no	05/01/02
UKIAH	TDMA	2030 Industry Road, Unit D, Ukiah, CA 95482	yes	05/08/02
GREENVILLE	CDMA	5167 Old Pactolus Highway, Greenville, NC. 27834	yes	05/08/02
ROCKFORD	TDMA	4417 Halgesen Drive, Madison, WI 53718	yes	05/14/02
LAREDO	TDMA	615 Gail Street, Laredo, TX 78041	yes	05/16/02
YAKIMA	CDMA	215 N 3rd Ave, Bldg F, Yakima, WA 98902	yes	05/21/02
VALDOSTA	TDMA	2903 N. Patterson St., Valdosta, GA 31602	yes	05/22/02
IOWA CITY	TDMA	Temporary Address: US Cellular, Midwest Region Office, 850 Twix Town Road, Cedar Rapids, IA 52402	yes	05/22/02
WATERLOO	TDMA	3420 W Ridgeway Avenue, Waterloo, IA 50701	yes	05/29/02
COLUMBUS, KS	TDMA	792 SW Messer Rd, Columbus, KS 66725	yes	05/29/02
STEVENS POINT	TDMA	3525A Patch St, Stevens Point, WI 54481	yes	05/30/02
MANSFIELD	TDMA	1631 Shores Drive, Norwood, MO 65717	yes	06/04/02
WILMINGTON	CDMA	6602 Amsterdam Way, Wilmington, NC 28405	yes	06/05/02
POCATELLO	TDMA	1750 N 1st Ave, Pocatello, ID 83201	yes	06/06/02
COLUMBIA, MO	TDMA	1804 Vandiver Drive, Columbia, MO 65202	yes	06/06/02
PEORIA	CDMA	5713 N. Humbolt Ave, Peoria Hghts, IL 61614	yes	06/11/02
BEEVILLE	TDMA	2524 Jones Rd, Beeville, TX 78102	yes	06/12/02
ATOKA	TDMA	220 East Hwy 3, Atoka, OK 74525	yes	06/18/02

WICHITA FALLS	TDMA	5073 Reilly Rd, Wichita Falls, TX 76305	yes	06/19/02
GAINESVILLE	TDMA	6110 NW 4th Place, Gainesville, FL 32607	yes	06/20/02
BEND	CDMA	105 SE Bridgeford Blvd, Bend, OR 97702	yes	06/26/02
TWIN FALLS	TDMA	688 Poleline Rd, Suite 6, Twin Falls, ID 83301	yes	07/02/02
TALLAHASSEE	TDMA	107 W Franklin St, Quincy, FL 32351	yes	07/09/02
ASHVILLE (WHITE FAWN)	CDMA	63 Turtle Creek, Asheville, NC 28803	yes	07/16/02
FT. PIERCE	TDMA	3221 NW Federal Hwy, Jensen Beach, FL 34957	yes	07/23/02
MADISON	TDMA	4417 Halgesen Drive, Madison, WI 53718	yes	09/10/02
LOGANSPOUT (Kilmore)	Analog	2024 E. County 250 N, Franklin, IN 46041	yes	09/11/02


LUCENT SWITCHES	Address		TTY/TDD Activated
MABSCOTT	CDMA	Mabscott, WV	Yes
MORGANTOWN	CDMA	Morgantown, WV	Yes
ROANOKE	CDMA	Roanoke, VA	Yes
LYNCHBURG (KELLY)	CDMA	Lynchburg, VA	Yes

Declaration

I, Jeffrey Baenke, hereby state under penalty of perjury the following.

1. I am Director of RF Engineering of United States Cellular Corporation.

2. I have read the foregoing Petition for Temporary Waiver and Extension of Time. The facts asserted therein are true and correct to my personal knowledge.



Jeffrey Baenke

6/20/2002
Date